

ORIGINAL

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Dee May  
Director  
Federal Regulatory Affairs

EX PARTE OR LATE FILE 

November 12, 1999

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RECEIVED**  
NOV 12 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York**

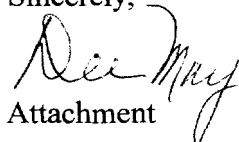
Dear Ms. Salas,

At the request of the Common Carrier Bureau Policy Division, Bell Atlantic met with representatives of the CCB on November 10 to address their questions regarding Loop Unbundling related issues. Attending from Bell Atlantic were, Leslie Vial, Augie Trinchese, John White, Bob Brant, Mike Glover, Jim Pachulski, Tom Maguire, and Ed Riley. Representatives from the Common Carrier Bureaus were Eric Einhorn, Johanna Mikes, Andrea Kearney, Sanford Williams, John Adams, Daniel Shiman, Rhonda Lien, Julie Patterson and Raj Kannan. The attached charts were used during the oral presentation.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is responding to direct questions raised by Commission staff and reviewed material addressed in our original application. The page limitation also does not apply to the material attached because it was used during the ex parte meeting to facilitate discussion. An ex parte could not be filed due to the lateness of the hour on November 10 and November 11 was a federal government Holiday.

Please feel free to contact me with any questions.

Sincerely,

  
Attachment

cc: J. Adams	R. Lien	J. Mikes	S. Williams
E. Einhorn	R. Kannan	J. Patterson	
A. Kearney	C. Matthey	D. Shiman	

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List ABCDE

Bell Atlantic-New York 271 Application

# FCC Ex Parte Presentation On Unbundled Loops

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November 10, 1999





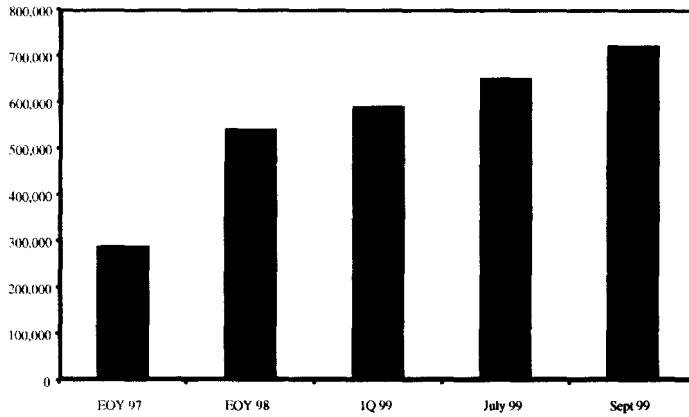
# Competitive Landscape in New York

Competitors are serving *more than 1.3 million lines.....*

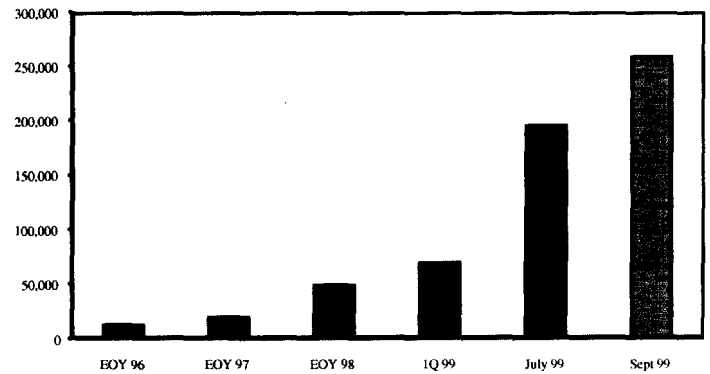
- More than 720,000 lines through their own facilities (predominantly CLECs with their own switches serving customers over their own fiber facilities)
- More than 300,000 lines through resale (including 250,000 business lines and more than 60,000 residential lines)
- More than 300,000 lines through unbundled elements
  - Nearly 250,000 unbundled loops provided as part of platform (predominantly to serve residential customers)
  - More than 55,000 unbundled loops used by competing carriers with their own switches

# Local Competition in New York

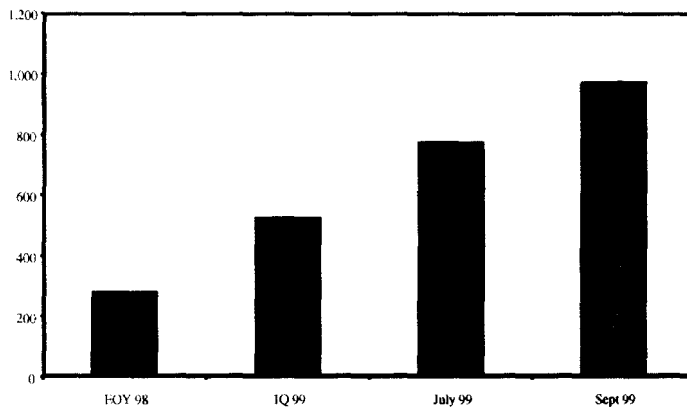
## CLEC Facilities-Based Lines



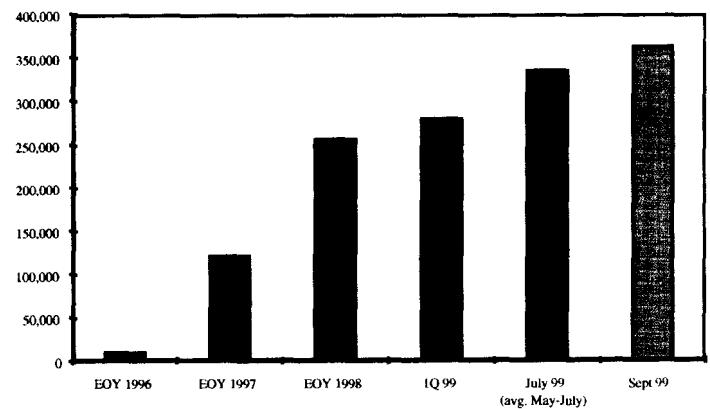
## CLEC Loops (Unbundled and Platform)



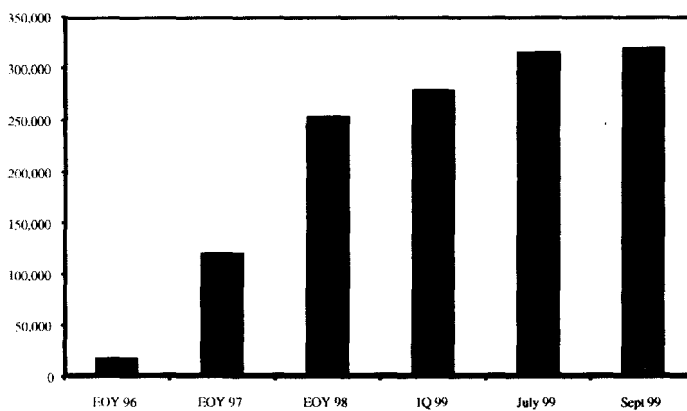
## CLEC Collocation Sites



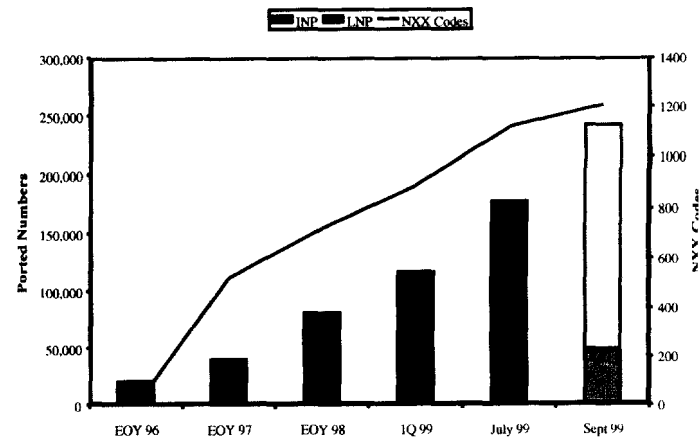
## CLEC Interconnection Trunks



## CLEC Resold Lines



## CLEC Ported Numbers and NXX Codes

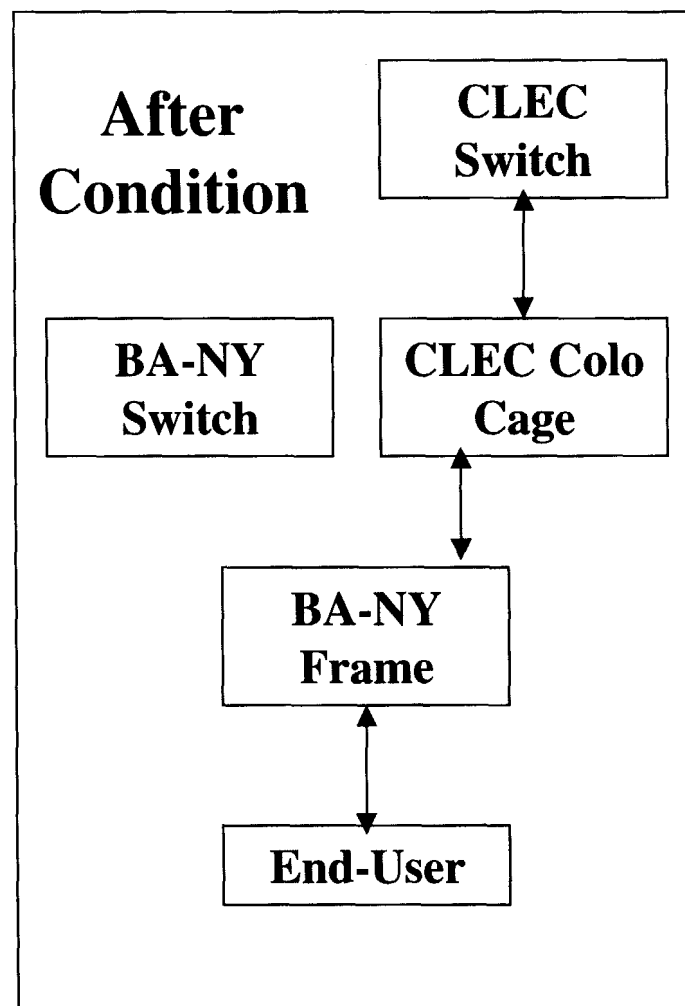
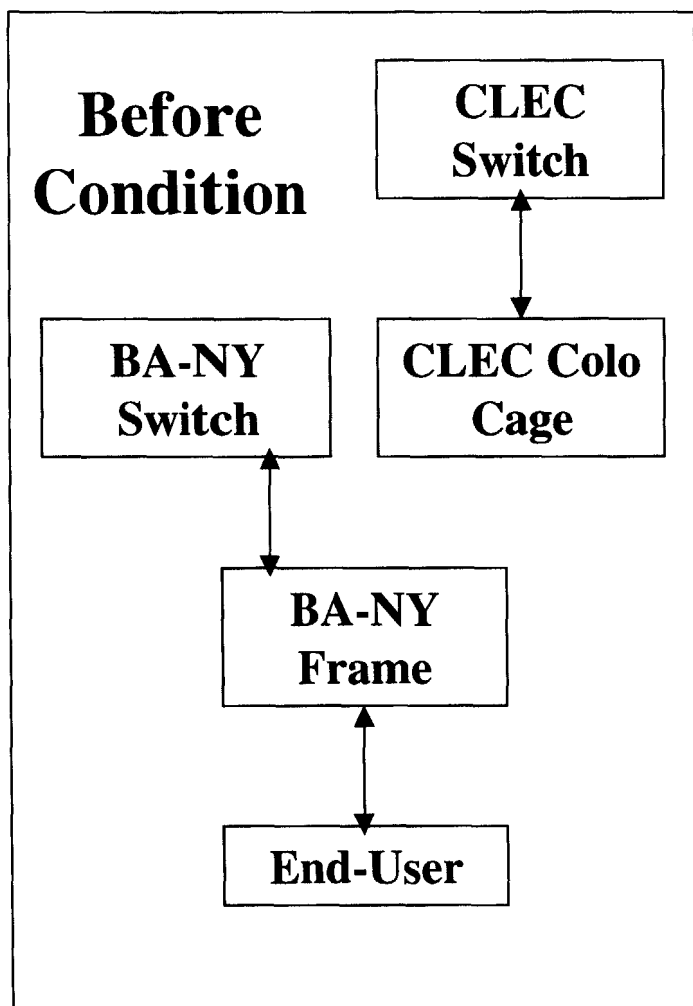




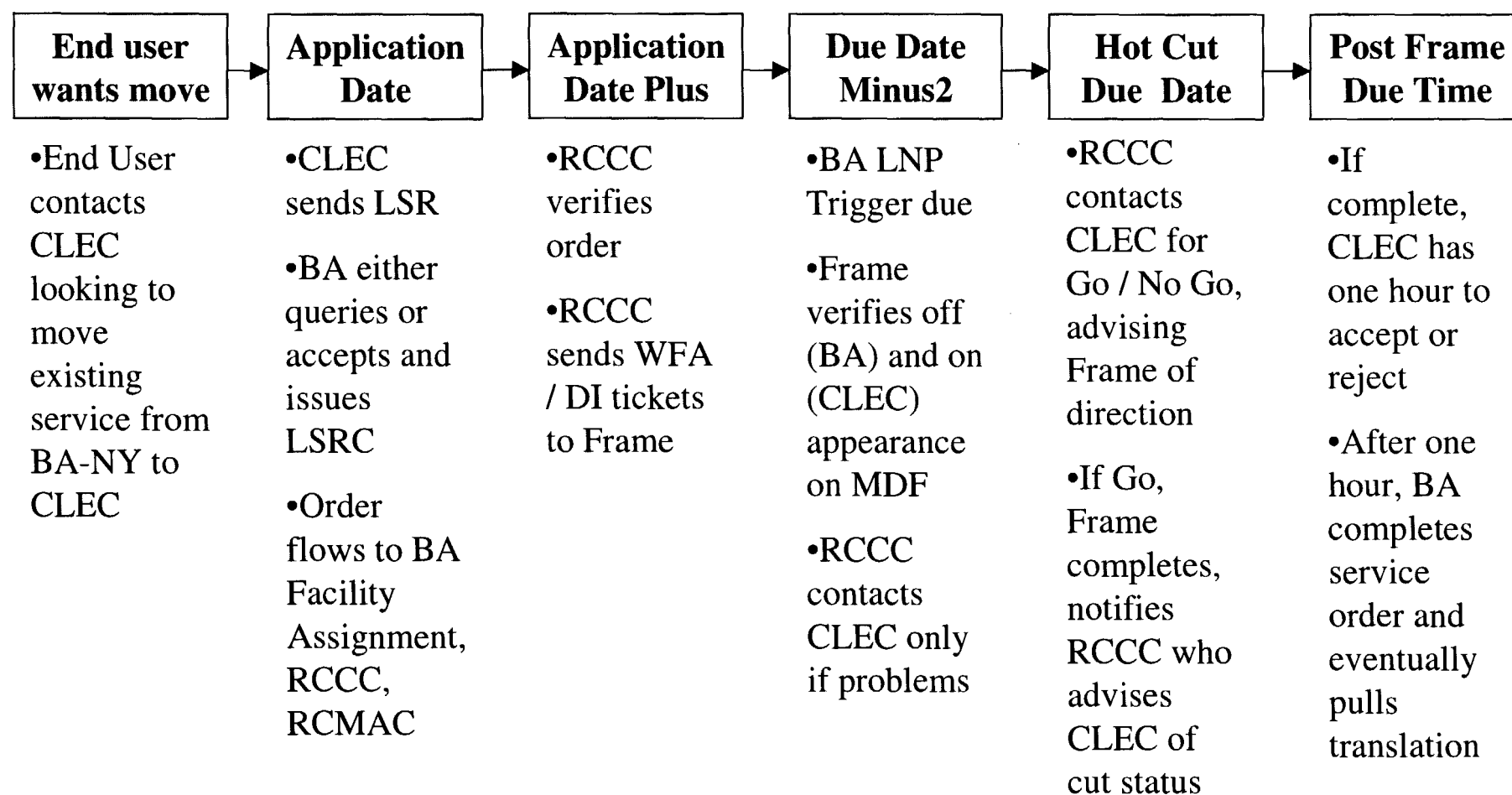
# Unbundled Loop Hot Cuts

- BA-NY overall performance since June 21 is nearly 93 percent on time
- Performance carefully monitored by NY PSC
  - Reviewed July data for AT&T hot cut orders. Found AT&T's data unreliable. Confirmed July performance at 91%
  - Conducted review of August AT&T hot cut orders with similar findings on data reliability and performance (91.5%)
- AT&T Issues:
  - Following the process
  - Service outages

# Simplified Hot Cut



# Simplified Hot Cut Process



# AT&T Hot Cut Process Issues

- Date Due minus 2 check
  - Purpose of check is to identify CLEC dial tone problems
  - PSC reconciliation scores a hot cut as a miss if check not completed and CLEC not given opportunity to correct dial tone problem
- Go/No Go Call
  - Process submitted as AT&T attachment never accepted by NYPSC and CLECs
  - AT&T operations team agreed that the Go/No Go call is not a problem

# AT&T Hot Cut Process Issues

- IDLC Facilities Check
  - Less than one percent of hot cuts involve IDLC facilities
  - BA-NY committed to standard intervals regardless of whether the loop is served by IDLC facilities
  - BA-NY looks for alternative facilities as soon as order is accepted
  - BA-NY dispatches on DD-1 to test alternative facilities
  - If DD-1 dispatch fails to ensure alternate facilities, BA-NY will attempt to push a pair through. Though this effort is usually successful, it many times results in a missed appointment.



# AT&T Hot Cut Service Outages

- NY PSC reviewed CLEC claims of service outages in July and found that they:
  - “did not yield evidence of widespread outages resulting from the hot cut process; indeed many of the service disruptions reported by competitors were no greater than inconveniences such as static on the line, and were no more and no different from disruptions Bell Atlantic – NY retail customers experienced.”
- AT&T’s service outage data is unreliable:
  - NY PSC determined that most of AT&T’s claimed outages were not attributable to BA-NY
  - Significant number of hot cuts were accepted by AT&T as working
  - AT&T took on average 56 hours to report service outages to BA-NY
  - BA-NY restored service quickly
    - Half restored within 24 hours of report from AT&T
    - 75 percent restored within 48 hours



# DSL Loop Issues

- DSL Products
- Loop Provisioning Process
- Loop Qualification Information
- Loop Conditioning



# Digital Loop Products

- Premium Digital Loops (used by CLECs to provide DSL service)
  - Loops that meet technical specs for ISDN service
  - Through September, over 3,300 premium loops provided to CLECs
- ADSL Loops
  - Copper loops less than 18,000 feet without load coils
  - Through September, over 1,100 ADSL loops provided to CLECs
- HDSL Loops
  - Copper loops less than 12,000 feet without load coils
- Digital Design Loop Offering
  - Tariff offering of loop conditioning services on all lengths of copper loops
  - Removal of load coils on loops longer than 18,000 feet
  - Removal of bridge taps
  - Addition of electronics that extend the effective range of ISDN/IDSL equipment on longer loops



# DSL Loop Provisioning Process

- NY PSC Collaboratives
- BA-NY is doing cooperative testing on DSL loop installations
  - 824 ADSL loops provisioned using this process
  - Only 21 – less than three percent – had trouble reports
- Average installation interval is approximately 7 days for CLECs' unbundled ADSL loops in parity with BA-NY's ADSL service
- Order confirmation performance will improve as more central offices are added to loop qualification database



# Testing Challenges

## Dry Copper Pair:

- No Dial Tone
- No Telephone Number
- No MLT availability
- No Battery
- No NT-1, No SPID
- No MTU or 1/2 Ringer
- Tone - sometimes available
- Training tone - intermittent and differs for each technology
- Different Test Signatures:
  - Looking from Field to DSLAM: open, Line Unit
  - Looking from C.O. to Modem: SC, CPE, Router
- Large variety of different loop technologies and equipment vendors

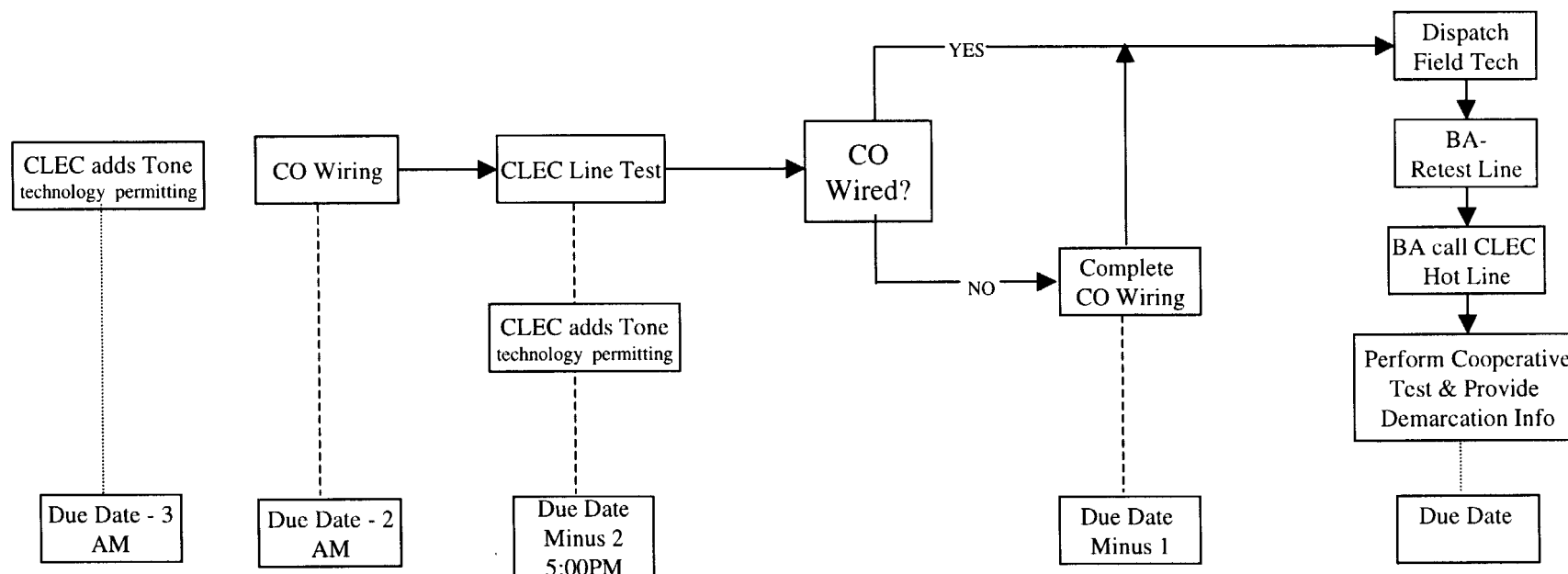
# Cooperative Testing

## Goals:

- Steady and Standard Tone Generation Eliminates Connectivity Concerns
- Shared Test Results Early AM on Due Date
- Testing to NID with Maintenance Benchmarks Established and Shared



# DSL Dispatch Process





# DSL Loop Qualification Information

- BA-NY provides a mechanized loop qualification database
  - Identifies which loops meet ADSL loop technical requirements
  - Provides lengths of unloaded loops including loops greater than 18,000 feet
  - By the end of 1999, the database will include over 90 percent of central offices with collocation
  - Contains more information than available to BA-NY retail representatives
- BA-NY provides manual loop qualifications within 48 hours
  - Available throughout New York
  - Advises CLECs whether load coils or digital loop carrier are on loop
- BA-NY provides engineering queries within 72 hours
  - Available throughout New York
  - Provides more information to CLECs: the physical loop length; the number and location of load coils; the length and location of bridge taps; the gauge of the wire; and the locations of digital loop carrier
  - Requires a search of complex paper records



# Loop Qualification

- Loop Planning Rules (Embedded Network)
  - Maximum loop resistance 1300 Ohms
  - Loading required on any loop over 18,000 ft
  - Bridge Tap on non loaded plant limited to 6,000 ft
  - Theoretical design = 2 gauges



Order Entry

http://166.68.105.9/WG\_TIS\_WS04/mgi/entry.slt/lxr/1/lxr

## Loop Qualification - xDSL

Key: ● Required ● Conditional ● Optional

SyRA. E. Genesee  
WIC

### Loop Qualification - xDSL

ERIC BIV &  
DEWITT NY.

End User State	● New York
Customer Indicator	● UNE
Service Provider	● 4634
Service Area ID	●
Service Address Telephone Number	● 315446
Service Address House Number	●
Service Address House Number Suffix	●
Assigned House Number	●
Route Number	●
Box Number	●
Service Address Street Directional	● --
Service Address Street Name	●
Service Address Thoroughfare	●
Service Address Street Suffix	●
Unit Type	●
Unit Information	●
Elevation	●
Structure Type	●
Structure Information	●
Service Address City	●
Service Address State	● New York
Street Address Zip Code	●

Submit

Hold Order

Cancel



[View Request/Response](#)

[http://166.68.105.9/WG\\_TIS\\_WS04/ncgi/dum.../lxt/responses/rsunche/lxr.990809.109.12](http://166.68.105.9/WG_TIS_WS04/ncgi/dum.../lxt/responses/rsunche/lxr.990809.109.12)

[Go to Service Request Page](#)

## Loop Qualification - xDSL

[View the RAW EIF File](#)

Administrative Data Table	
Billing Telephone Number	2123954085
End User State	NY
Customer Indicator	C
Version	AA
Customer Negotiator Name	Roslyn Sanchez
Purchase Order Number	19990809140753
Customer ID	ZBEL
Customer Negotiator Telephone Number	2123954085
Business Segment	R
Loop Qualification - xDSL	
Service Address State	NY
xDSL Services Available	640KBPS/90KBPS 1.6MBPS/90KBPS 7.168MBPS/680KBPS
xDSL Qualification Indicator	Y
Loop Length	1.9



Order Entry

[http://166.68.105.9/WG\\_TIS\\_WS04/ncgi/deleteord.sh?xr](http://166.68.105.9/WG_TIS_WS04/ncgi/deleteord.sh?xr)

## Loop Qualification - xDSL

Key: ● Required ● Conditional ● Optional

### Loop Qualification - xDSL

WIC  
ITHACO Tioga  
ST  
AURORA  
ITHACA NY

End User State	● New York ▼
Customer Indicator	● UNE ▼
Service Provider	● 4634
Service Area ID	●
Service Address Telephone Number	● 607272
Service Address House Number	●
Service Address House Number Suffix	●
Assigned House Number	●
Route Number	●
Box Number	●
Service Address Street Directional	● -- ▼
Service Address Street Name	●
Service Address Thoroughfare	●
Service Address Street Suffix	●
Unit Type	●
Unit Information	●
Elevation	●
Structure Type	●
Structure Information	●
Service Address City	●
Service Address State	● New York ▼
Street Address Zip Code	●

Submit

Hold Order

Cancel



[View Request/Response](#)

[http://166.68.105.9/WG\\_TIS\\_WS04/ncgi/dum.../lxf/responses/rsanche/lxr.990809.108.12](http://166.68.105.9/WG_TIS_WS04/ncgi/dum.../lxf/responses/rsanche/lxr.990809.108.12)

[Go to Service Request Page](#)

## Loop Qualification - xDSL

[View the RAW EIF File](#)

Administrative Data Table	
Billing Telephone Number	2123954085
End User State	NY
Customer Indicator	C
Version	AA
Customer Negotiator Name	Roslyn Sanchez
Purchase Order Number	19990809140407
Customer ID	ZBEL
Customer Negotiator Telephone Number	2123954085
Business Segment	R
Loop Qualification - xDSL	
Service Address State	NY
xDSL Services Available	Loop is not qualified
xDSL Qualification Indicator	Y
Loop Length	16.4

New York Telephone Company  
Engineering School

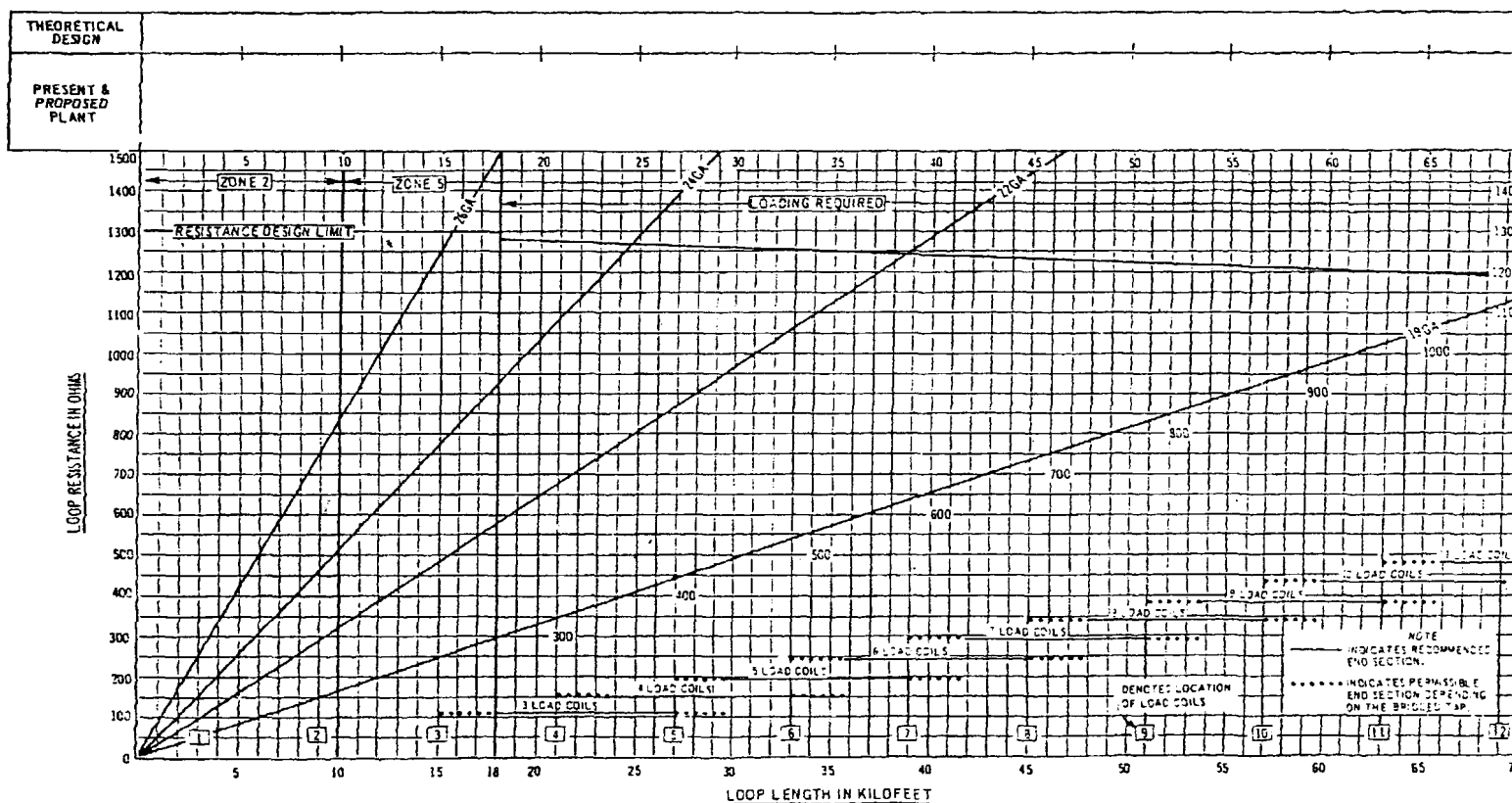
Outside Plant Engineering - Course 1  
(Basic) - Lesson 4 - R3.7.71

EXTRACT #24

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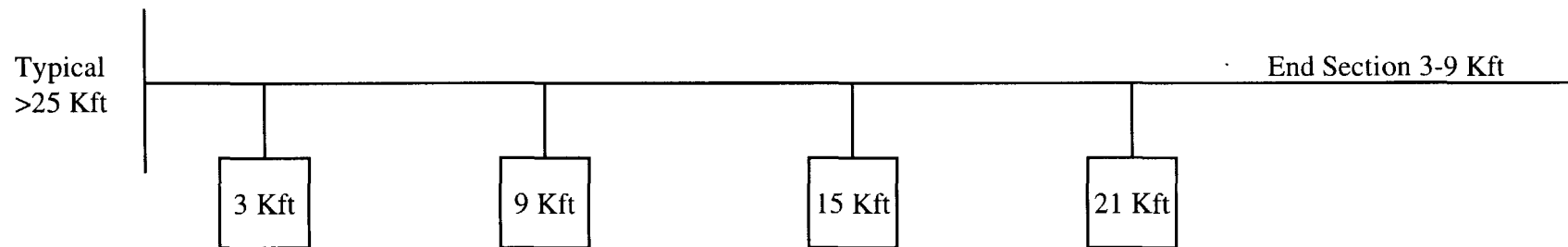
SLIDE #15

# RESISTANCE DESIGN WORK SHEET



# Number of Loads at Loop Length

Kilofeet	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
# of Loads	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3	3	3	3	3	4	4	4	4	4	4

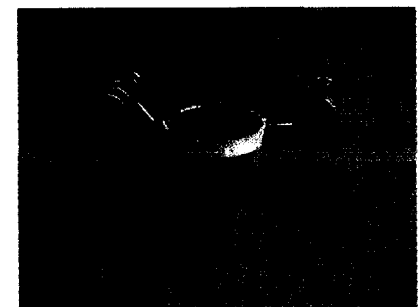
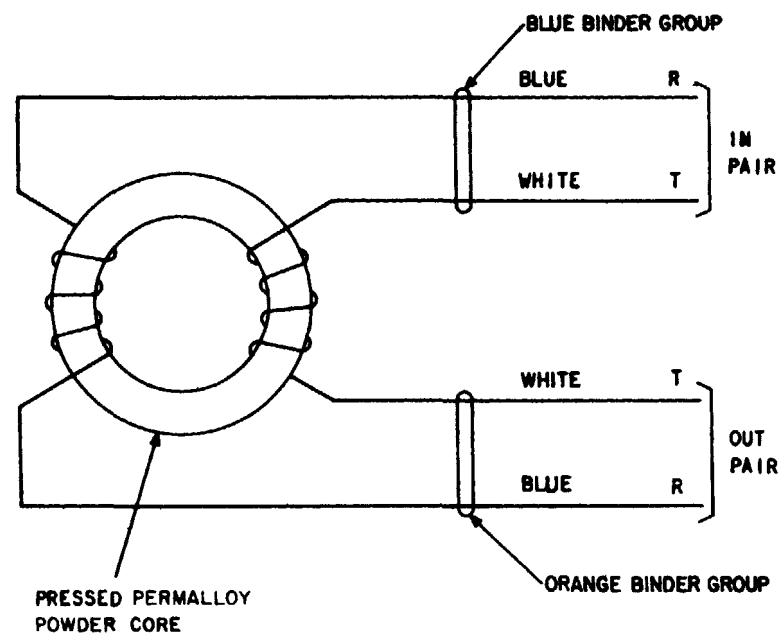




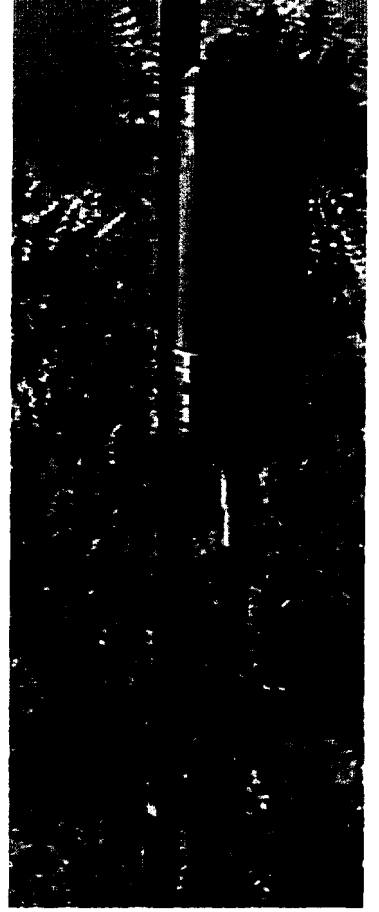
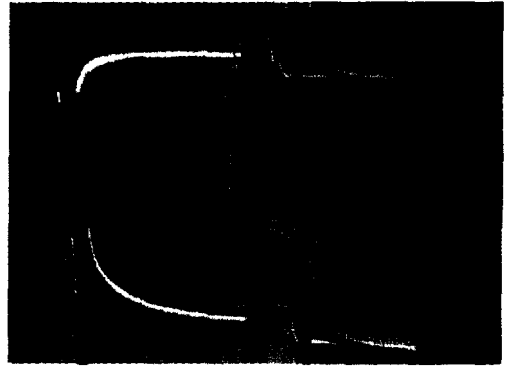
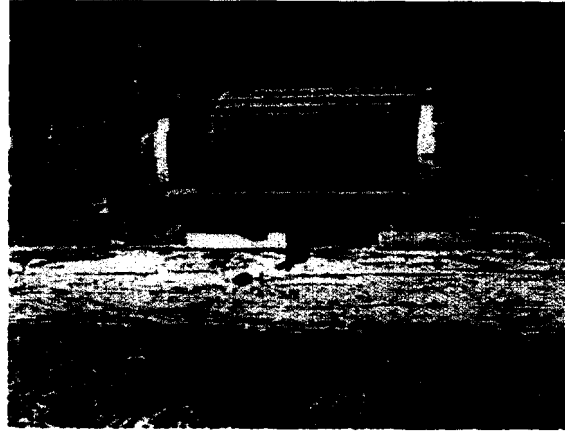
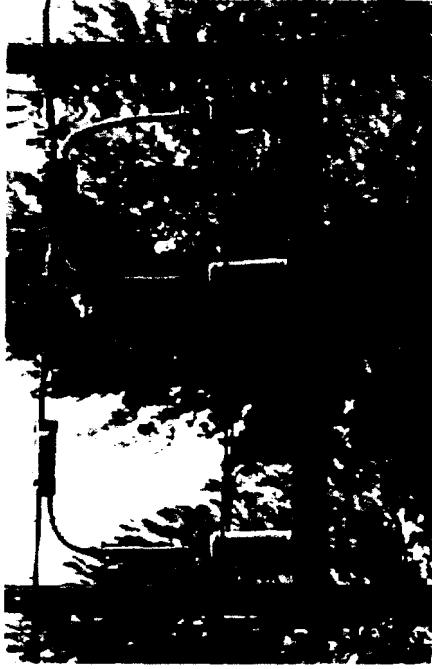
# Cable Gauge vs. Loop Length

Kilofeet of	Total Kft	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
	26 Gauge	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	14.5	13.0	11.5	9.0	7.5	6.0	4.0	2.5	1.0						
	24 Gauge	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.5	4.0	6.5	10.0	12.5	15.0	18.0	20.5	23.0	24.0	22.0	20.0	18.5	17.5	15.5
	22 Gauge	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.0	4.0	7.0	9.5	11.5	14.5

# Simple Load Coil



# Load Coil Cases





# DSL Loop Conditioning

- BA-NY has tariffed standardized rates for loop conditioning
  - Removal of load coils on any length of copper loop
  - Removal of bridge taps on any length of copper loop
  - Addition of electronics that extend the effective range of ISDN/IDSL equipment on longer loops
- BA-NY provides alternative facilities on loops with DLC
  - If alternative facilities are available to customer location and those facilities are DSL-capable, BA-NY will provision DSL loops using those alternative facilities at no additional charge